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7 Attorney for Ivan Yair Tovar-Rodriguez

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11

12 Plaintiff,

13 v.

14 IVAN YAIR TOVAR-RODRIGUEZ,
15

Defendant.

Case No. 2:21-cr-00108-APG-NJK

**STIPULATION TO CONTINUE
SENTENCING HEARING**
(First Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Allison Reese, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Jawara Griffin,
20 Assistant Federal Public Defender, counsel for Ivan Yair Tovar-Rodriguez, that the Sentencing
21 Hearing currently scheduled on October 25, 2023, be vacated and continued to a date and time
22 convenient to the Court, but no sooner than forty-five (45) days.

23 This Stipulation is entered into for the following reasons:

24 1. Mr. Tovar-Rodriguez needs additional time to compete necessary requirements
25 to received safety valve benefits.

26 2. The defendant is in custody and agrees with the need for the continuance.

3. The parties agree to the continuance.

1 This is the first request for a continuance of the sentencing hearing.

2 DATED this 2nd day of October, 2023.

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4 RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

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6 By /s/ Jawara Griffin

By /s/ Allison Reese

7 JAWARA GRIFFIN
8 Assistant Federal Public Defender

ALLISON REESE
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 IVAN YAIR TOVAR-RODRIGUEZ,


7 Defendant.
8

Case No. 2:21-cr-00108-APG-NJK

ORDER

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10 IT IS THEREFORE ORDERED that the sentencing hearing currently scheduled for
11 Wednesday, October 25, 2023 at 9:00 a.m., be vacated and continued to January 3, 2024 at the
12 hour of 1:30 p.m. in Courtroom 6C; or to a time and date convenient to the court.

13 DATED this 3rd day of October, 2023.

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16 UNITED STATES DISTRICT JUDGE
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